

**European Union comments for the
CODEX COMMITTEE ON CONTAMINANTS IN FOOD
12th Session**

Utrecht, the Netherlands, 12-16 March 2018

Agenda Item 14

Request for comments on the discussion paper on future work on maximum levels for lead for inclusion in the general standard for contaminants and toxins in food and feed (CX/CF 18/12/14)

*European Union Competence
European Union Vote*

The European Union (EU) welcomes the work by the electronic Working Group chaired by Brazil on future work on maximum levels for lead for inclusion in the general standard for contaminants and toxins in food and feed.

The EU would like to comment that because JECFA was not able to establish a safe level of exposure to lead, MLs should be set As Low As Reasonably Achievable (ALARA) in order to reduce the exposure to lead. In order to achieve this goal, the prioritisation of food items for the setting of MLs, should be done on the basis of a high exposure to lead, resulting from these food items, rather than on the basis of high occurrence data for lead. Commodities with high lead levels could be less relevant for setting MLs due to a low exposure in case they are consumed in lower quantities, while commodities with lower levels could be more relevant, when consumed in high quantities. The limited contribution to the exposure to lead from cocoa and cocoa products and tea and herbs/fruits for infusions would not justify their inclusion in the high priority list.

As MLs are already set for fresh fruit and vegetables, which can be enforced for dried fruit and vegetables, through the use of processing factors, there is no need to set separate MLs for dried fruits and vegetables.